

TM:JMR  
F.#2010R00617

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

SANDRO AIOSA,

Defendant.

- - - - -X

I N F O R M A T I O N

Cr. No. 10-866 (NGG)  
(T. 18, U.S.C., §§  
981(a)(1)(C), 1955(a),  
1955(d), 2 and 3551 et  
seq.; T. 21, U.S.C., §  
853(p); T. 28, U.S.C., §  
2461(c))

THE UNITED STATES ATTORNEY CHARGES:

ILLEGAL GAMBLING

1. In or about and between June 2008 and January 2009, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant SANDRO AIOSA, together with others, did knowingly and intentionally conduct, finance, manage, supervise, direct and own all or part of an illegal gambling business, to wit: a gambling business involving a poker game, which operated in violation of the laws of New York State, to wit: New York Penal Law Sections 225.05 and 20.00, which involved five or more persons who conducted, financed, managed, supervised, directed and owned all or part of such business and which remained in substantially continuous

operation for a period in excess of thirty days and had a gross revenue of at least \$2,000 in any single day.

(Title 18, United States Code, Sections 1955(a), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant SANDRO AIOSA that, upon his conviction of such offense, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) of any property, real or personal, which constitutes or is derived from proceeds traceable to such offense; and (b) Title 18, United States Code, Section 1955(d) and Title 28, United States Code, Section 2461(c) of any property, including money, used in violation of such offense, including but not limited to a sum of money representing the amount of proceeds obtained as a result of the offense.

3. If any of the property described above, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

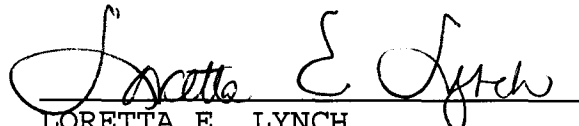
b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or  
e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of such defendant up to the value of the forfeitable property.

(Title 18, United States Code, Sections 981(a)(1)(C) and 1955(d); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

  
LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK